

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

iSun, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11144(TMH)

(Jointly Administered)

RE: D.I. 61

**SUPPLEMENTAL DECLARATION OF RICHARD F. NEJAME IN SUPPORT OF  
DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER: (I) AUTHORIZING  
DEBTORS TO EMPLOY AND RETAIN ENGLAND SECURITIES, LLC AS FINANCIAL  
ADVISOR AND INVESTMENT BANKER TO THE DEBTORS *NUNC PRO TUNC* TO  
THE PETITION DATE, (II) APPROVING THE TERMS OF THE ENGAGEMENT  
AGREEMENT, (III) MODIFYING CERTAIN TIME-KEEPING REQUIREMENTS,  
AND (IV) GRANTING RELATED RELIEF**

I, Richard F. NeJame, declare as follows:

1. My name is Richard F. NeJame. I am over the age of eighteen (18) and make the statements herein upon my own personal knowledge. I am qualified and authorized to make the statements herein.

2. I am a Managing Director at England Securities, LLC (“England”), the proposed investment banker for iSun, Inc. and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”).

3. I submit this supplemental declaration (the “Supplemental Declaration”) in support of the *Debtors’ Application for Entry of an Order (I) Authorizing Them to Employ and Retain*

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<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four (4) digits of their federal tax identification numbers, are: (i) iSun, Inc. (“iSun”) (0172) (ii) Hudson Solar Service, LLC (“Hudson”) (1635); (iii) Hudson Valley Clean Energy, Inc. (“Hudson Valley”) (8214); (iv) iSun Corporate, LLC (“iSun Corporate”) (4391); (v) iSun Energy, LLC (“iSun Energy”) (1676); (vi) iSun Industrial, LLC (“iSun Industrial”) (4333); (vii) iSun Residential, Inc. (“iSun Residential”) (3525); (viii) iSun Utility, LLC (“iSun Utility”) (4411); (ix) Liberty Electric, Inc. (“Liberty”) (8485); (x) Peck Electric Co. (“Peck”) (5229); (xi) SolarCommunities , Inc. (“SolarCommunities”) (7316); and (xii) Sun CSA 36, LLC (“Sun CSA”) (7316); (collectively referred to as the “Debtors”). The Debtors’ mailing address is: 400 Avenue D, Suite 10 Williston, Vermont 05495, with copies to Gellert Seitz Busenkell & Brown LLC, Attn: Michael Busenkell, 1201 N. Orange Street, Suite 300, Wilmington, DE 19801.

*England Securities, LLC as Financial Advisor and Investment Banker to the Debtors Nunc Pro Tunc to the Petition Date, (II) Approving the Terms of the Engagement Agreement, (III) Waiving Certain Time-Keeping Requirements, and (IV) Granting Related Relief (the “Application”).<sup>2</sup>*

4. I am submitting this Supplemental Declaration to provide further clarification of England’s review for conflicts with potential parties in interest in these cases.

5. England is affiliated with the following entities: England & Company, LLC, England Capital Partners, LLC, England & Company International Holdings, LLC, England & Company Corporate Advisory (Asia) Pty Ltd. (the “Affiliates”).

6. England and the Affiliates may from time to time engage in investment activity for their own benefit, though currently only England holds any investments.

7. England’s electronic database search procedures include and capture the full extent of any investment activity conducted by England or the Affiliates.

8. In reviewing for potential conflicts, England researched the electronic databases for England and all of the Affiliates, which returned zero results.

9. To the best of my knowledge and belief, England Securities, LLC and the Affiliates have not represented any Potential Parties in Interest in connection with matters relating to the Debtors or their estates, assets, or businesses and will not represent other entities which are creditors of, or have other relationships to, the Debtors in matters relating to these cases.

10. To the extent that England discovers any additional facts bearing in a material respect on its disinterestedness during the period of England’s retention in connection with these cases, England will supplement this Declaration, as required by Bankruptcy Rule 2014(a).

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Application.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 20, 2024

*/s/Richard F. NeJame*  
Richard F. NeJame  
Managing Director  
England Securities, LLC

## **SCHEDULE 1**

### **Parties in Interest List**

#### **Debtors:**

- Hudson Solar Service, LLC
- Hudson Valley Clean Energy, Inc.
- iSun Corporate, LLC
- iSun Energy LLC
- iSun Industrial, LLC
- iSun Residential, Inc.
- iSun Utility, LLC
- iSun, Inc.
- Liberty Electric, Inc.
- Peck Electric Co.
- SolarCommunities, Inc.
- Sun CSA 36, LLC

#### **Professionals:**

- Gellert Seitz Busenkell & Brown, LLC
- Epiq Corporate Restructuring, LLC

#### **State and Federal Taxing Authorities:**

- Internal Revenue Service
- Vermont Department of Taxes
- Maine Revenue Services
- Massachusetts Department of Revenue
- Delaware Division of Revenue
- New Hampshire Department of Revenue Administration
- SC Department of Revenue
- RI Division of Taxation

#### **Banks:**

- First National Bank
- NBT Bank
- Merchants
- New England Federal Credit Union
- TD Bank
- VSECU
- Citizens Bank
- M&T Bank

#### **Insurance Companies:**

- Arch Insurance Co.

- Colony Insurance Co.
- Evanston Insurance Co.
- Palomar Excess & Surplus Lines
- Continental Casualty
- Columbia Casualty
- Nation Union Fire Insurance Company of Pittsburgh
- Berkley Insurance Co.
- Nation Union Fire Insurance Company of Pittsburgh
- Liberty Mutual Insurance Co.
- Accelerant Specialty
- Hiscox Insurance
- Ohio Casualty Insurance Co.
- Lloyds of London
- Travelers
- Assured Partners

**Utilities:**

- GMP
- VT Gas
- TPX
- Casella
- Comcast
- Liberty Utilities
- Palmer Gas Co.
- Nextiva
- Central Hudson
- Green Mountain Power Corp
- Waste Management of NY
- Myers Container Service Corp
- Megan Kolbay
- Edward Farrar Utility District
- Verizon
- Vonage Business Inc.
- Consolidated Communications
- Spectrum Business

**Consolidated Top 30 Unsecured Creditors:**

- Tesla Energy
- Green Mountain Electric (GMES)
- APA Solar Racking
- Opsun Systems, Inc.
- Polar Racking Inc - Utility

- Sun Pull Bundled Wire
- Gamechange Solar
- Light Chain Solar LLC
- CED Greentech East 0120/0933
- IBEW Local 300
- Chint Power Systems America Co. (CPS)
- QT Corporation
- American Express
- Merritt & Merritt
- First Insurance Funding
- Solar Operation Solutions
- AssuredPartners
- Sunbelt Solomon
- Zane Construction, LLC
- Marcum - Corp
- Soderberg Construction
- T Ford Company, Inc
- NECA/IBEW Family Medical Care Plan
- Ridgeback Solar
- Cummins Sales and Service
- One Source Security
- R&R Pipeline Construction and Repair, Inc
- I.C. Reed & Sons, Inc.
- Terrasmart
- IBEW Local 567

**Secured Creditors:**

- Ally Financial
- Cedar Advance
- Citizens One
- Decathlon Specialty Finance
- Ford Moto Credit Company
- GM Financial
- Kubota
- Lendspark
- Mercedes Benz
- NBT Bank
- Pawn Funding
- Toyota
- VCLF
- VEDA

**Contract Parties - Projects:**

- Agilitas
- BD Solar Larson LLC
- BD Solar N. Anson, LLC
- BD Solar Norridgewock LLC
- BD Solar North Anson LLC
- BD Solar Rangeley, LLC
- BNRG Renewables Limited
- Bristol BESS, LLC
- Burlington Electric Dept.
- Eastern Development Corp
- Electrify America, LLC
- Encore Redevelopment
- Encore Redevelopment, LLC
- Encore Renewables
- ER Kendall Hill Solar, LLC
- ER Waite Cemetery Solar, LLC
- Fusion Renewable NA, LLC
- Giri Cherryfield Solar, LLC
- Giri Jonesboro Solar, LLC
- GMP
- Halladay Solar, LLC
- J. A. Morrissey, Inc.
- Kendall Sustainable Infrastructure, LLC
- Kenneth R Adams, Inc.
- KSI II Consolidated LLC
- Lebanon Berwick Hubbard Solar 1, LLC
- Lebanon West Lebanon Solar 1, LLC
- Limerick Range Solar 1, LLC
- MHG Solar LLC
- Naples Old County Solar 1, LLC
- Naples Roosevelt Trail Solar 1, LLC
- Neagley & Chase Construction
- Novus Rock Pit Solar, LLC
- Parsonsfield Sokokis Solar 1, LLC
- ReArch Company, Inc.
- Seak Oak Capital, LLC
- Simon Pearce, Inc.
- Solar Rocks LLC
- Soltage
- SSI Dev Co, LLC
- Standish Bonny Eagle Solar 1, LLC
- Stone Mill Solar, LLC
- SV Construction, LLC

- Trolley Tracks Solar, LLC

**Contract Parties - Vendors:**

- APA Solar Racking
- Terrasmart
- QT Corporation
- GE-Prolec Transformers, Inc.
- Tavrida Electric North America Inc
- Also Energy, Inc.
- Williams Scotsman, Inc
- United Rentals
- Sunbelt Rentals
- Green Mountain Electric Supply
- Next2Sun
- Sunbelt Solomon
- Chint Power Systems America Co
- Chint Power Systems America Utility
- Bretco, Inc
- Marsh & McLennan Agency LLC
- Meta Power Solutions
- RP Construction Services, LLC
- Green Mountain Power
- Trina Solar (U.S.), Inc.
- A-1 Sewer & Drain Service, Inc.
- Camp Precast Concrete Products, Inc.
- Casella
- CED Twin State
- Deschaine's Sanitation Service
- Eaton Corporation
- Foss Enterprises
- Gamechange Solar
- Grainger
- Polar Racking Inc - Utility
- Opsun Systems, Inc.
- Graybar
- P & P Septic Service, Inc.
- Ken Allen's Septic, LLC & Portable Toilet Services
- Groundwater & Environmental Services, Inc
- Herc Rentals
- JCL Energy
- Kern Solar Structures
- Reliable Power, Inc.
- Resilient Networks, Inc.

- Scott R Secrest, PE
- Southern States
- Sun Pull Bundled Wire
- NetSuite
- Salesforce
- Quickbase
- Trimble
- Aurora Solar
- Marcum
- Chedda Management
- Caroline Incavo
- Merritt & Merritt
- Dinsse
- Jarvis
- Gallagher, Flynn & Company, LLP
- Novo Advisors
- Gellert Seitz Busenkell & Brown, LLC
- Epiq Corporate Restructuring, LLC
- NASDAQ
- Business Wire

**Contract Parties - Subcontractors:**

- Larkin Enterprises
- Terrasmart
- Zane Construction, LLC
- APA Solar Racking
- T Ford Company, Inc
- Ridgeback Solar
- WSP USA Environment & Infrastructure Inc
- Tidewater Engineering & Surveying, Inc DBA North Easterly Surveying
- Skilled Trades Partners, Inc.
- Phoenix Solar LLC
- Solar Operation Solutions
- SME
- Portside Systems, LLC
- Dirigo Surveying
- Straightline Fence
- Krebs & Lansing Consulting Engineers
- Homestead Fence Company
- Green Mountain Power
- Driscoll Brothers Excavating, LLC
- VHB
- Ferncroft Property Service LLC DBA Kurtz Excavating

- Beitzel Corporation
- CH Robinson
- Desrochers Excavating, Inc.
- Haley Ward
- Liberty Electric, Inc.
- Light Chain Solar LLC
- Lotor Solar & Greenhouse LLC
- Milliken Brothers, Inc.
- Portside Systems, LLC
- Power Engineers, LLC
- PROLine Utility Construction
- R&R Pipeline Construction and Repair, Inc
- Soderberg Construction
- The Cote Corporation

**Litigation Parties:**

- Alpha Engineering Services, PA d/b/a Alpha Environmental
- Mays Johnsonson Law
- Green Mountain Electric Supply
- MSK Attorneys
- Lakeview Loan Servicing, LLC
- Roach & Lin, P.C.
- Marvin Kemp & Cole, PLLC
- Madison Energy Holdings, LLC
- Kenney & Sams, P.C.
- Misenko Construction Law
- Duane Peterson
- James Moore
- Jeffrey Irish
- Sheehey Furlong Behm P.C.
- Peck Investment Properties, LLC
- Currier, Trask & Dunleavy
- Sassoon Peress and Renewz Sustainable Solutions, Inc.
- Lynn, Lynn, Blackman & Manitsky, P.C.

**Delaware Bankruptcy Judges:**

- Judge John T. Dorsey
- Judge Craig T. Goldblatt
- Judge Thomas M. Horan
- Judge Karen B. Owens
- Judge Brendan L. Shannon
- Chief Judge Laurie Selber Silverstein

- Judge J. Kate Stickles
- Judge Mary F. Walrath
- Judge Ashely M. Chan

**Office of the United States Trustee,  
Region 3, Wilmington, DE Office**

- Joseph McMahon
- Lauren Attix
- Malcolm M. Bates
- Fang Bu
- Linda Casey
- Joseph Cudia
- Holly Dice
- Shakima L. Dortch
- Timothy J. Fox, Jr.
- Diane Giordano
- Michael Girello
- Christine Green
- Benjamin Hackman
- Ramona Harris
- Nyanquoi Jones
- Jane Leamy
- Jonathan Lipshie
- Hannah M. McCollum
- Jonathan Nyaku
- James O'Malley
- Linda Richenderfer
- Richard Schepacarter
- Edith A. Serrano
- Rosa Sierra-Fox
- Elizabeth Thomas
- Dion Wynn